

January 16, 1980

CD-80-01

Subject: Procedures for Submitting Vehicle Test and maintenance
Data for the 1981 Model Year

Dear Manufacturer:

On December 13, 1979, I sent you a letter describing modifications to the certification protocol for the 1981 model year. Section 3, Enclosure I of that document explained that, despite general adoption of Modified Abbreviated Certification Review, industry should submit to EPA all test and maintenance data in accordance with the requirements for completeness and timeliness spelled out by the regulations. This letter details the procedures to be followed for the present for making these test and maintenance data submissions.

The central principles of these submission procedures are (1) test maintenance data should be submitted to EPA as quickly as they are generated; (2) data for every test should be submitted; (3) test data should be submitted on computer data forms or their machine-readable equivalents, rather than on hard copy vehicle test data logs as was specified by the 1981 Light-Duty Motor Vehicle Application Format; (4) maintenance data should still be submitted in hard copy on vehicle maintenance logs, as the Format provides.

By collection of all test results in the EPA computer data base, these new procedures will eliminate repetitive updating of the hard copy test logs, the need for manufacturers to retrieve and then resubmit test data generated at EPA, and the prior practice of submitting the same data on certain tests on both computer input forms and hard copy test logs.

The following test data submission procedures should be followed:

1. For each durability-data and emission-data vehicle, the manufacturer should submit a Vehicle Information Data Sheet or its machine-readable equivalent (Application Format 12.01.02.00) as soon as the vehicle is built, if possible, and in no case later than submission of zero-mile testing. If the manufacturer elects to waive the zero-mile testing, the Vehicle Information Data Sheet must nonetheless be submitted prior to the start of mileage accumulation. Preparation of the Vehicle Information Data Sheet is explained in the May 21, 1979 "Guidelines for

Preparation and Submission of Certification Data Forms."

2. Manufacturers should submit data on all tests. This requirement includes void tests, failures, before or after maintenance tests not used for deterioration factor calculation, development tests, etc. Submissions should be on the Manufacturer's Test Data Sheet (or its machine-readable equivalent). Field-by-field instructions for filling out the manufacturer's Test Data Sheet are provided in the May 21 guidelines cited above.

3. Data from all tests should be air posted to EPA within 24 hours (or delivered within 3 working days), as is required by 40 CFR 86.078-26(a) (6)(i).

4. Submission of the test data information may be on EPA's official data sheets, standard 80-column IBM computer cards, or specially constructed files on manufacturer-controlled Michigan Terminal System accounts to which EPA has access. Submission of data sheets, as well as mailed submissions of punched cards, should be directed to the certification team member assigned to data base maintenance and other computer-related functions. The submissions need not be accompanied by cover letters, but punched card submissions must be carefully secured and clearly labeled. The label should specify the manufacturer, the data type (whether vehicle information or manufacturer's test data), and the vehicle identification numbers of the vehicles on which the data were generated. Data types must not be mixed within a single card deck. (Manufacturers interested in instituting electronic data submissions should direct their preliminary inquiries to Ms. Margaret J. Stasikowski, Chief, Operations Office.)

Output reports generated by these submissions will be returned to the manufacturer at the earliest possible opportunity, to provide a record of the data. Output reports generated by these submissions will be returned to the manufacturer as soon as possible so that he/she has the opportunity to confirm the correctness of the submission.

The procedure for submitting vehicle maintenance data is simply to use the traditional format recommended in the Appendix, page 16, of the 1981 Light-Duty Motor Vehicle Application Format and to submit updated logs in accordance with the requirements of 86.078-25(a)(10).

Revised versions of the Vehicle Information and Manufacturer's

Test Data Sheets, together with revised and recompiled instructions for filling them out, will be issued by February 15, 1980.

Should you have additional questions about these recommendations,
please contact your certification team.

Sincerely yours,

Robert Maxwell, Acting Director
Certification Division
Mobile Source Air Pollution Control